

Horn, Michael S.

From: Horn, Michael S. <mhorn@archerlaw.com>
Sent: Friday, October 2, 2020 1:45 PM
To: John Janiec
Subject: ITG v. PeaceBird
Attachments: (219454243 – 1) - PROPOSED PROTECTIVE ORDER - Redline.DOCX

John

Attached are my proposed changes to the Proposed Protective Order. Since this is a working draft, all parties reserve the right to suggest any changes before finalized.

In addition, I am aware that your contact at ITG is on maternity leave so there is a slight delay in the production of documents. In the meantime, I wanted to provide you a very simple list of some of the documents that we are looking to procure. This is not to be used to replace the prior lists and/or demands. Rather it is just an effort to try and provide additional direction. In other words, if a category we previously requested is not on this shortened list, we still want those documents.

The following is a summary of examples of some of the very important documents and/or information we are seeking:

- 1) Bank statements or proof of payments from my clients and/or proof of payments of any duties, taxes and/or customs
- 2) Any documents related to the payment and/or timing of the payments of duties, taxes and/or customs by your client
- 3) An articulation of your client's alleged damages
- 4) What shipments your client claims were received by my client and what shipments were not received
- 5) Any internal or external emails, texts or other messages (i.e. whatsapp) regarding the goods, customs, shipments or relationship between the parties
- 6) Any documents regarding quality control measures for the goods at issue in the case
- 7) A list of shipments your client contends were subject to the arbitration
- 8) All submissions made at the arbitration
- 9) All transcripts of testimony at the arbitration
- 10) All documents related to the goods at issue and/or the shipments of the goods at issue
- 11) Any and all financial records or tax returns articulated your client's alleged losses
- 12) Any documents related to any insurance claims
- 13) Any documents evidencing when you contend my client received any goods, shipments or documents such as bills of lading

We reserve the right to amend this short list

I appreciate your attention to this matter.

Michael S. Horn, Esq.

Archer & Greiner P.C.
Court Plaza South, West Wing
21 Main Street, Suite 353
Hackensack, NJ 07601
201-498-8529

1211 Avenue of the Americas, Suite 2750
New York, NY 10036
212-682-4940

mhorn@archerlaw.com
www.archerlaw.com



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